

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KIRA WAHLSTROM,

Plaintiff

v.

DAVID J. HOEY, LAW OFFICES OF
DAVID J. HOEY, P.C., DON C. KEENAN,
AND D.C. KEENAN & ASSOCIATES, P.C.
D/B/A THE KEENAN LAW FIRM, P.C., and
KEENAN’S KIDS FOUNDATION, INC.

Defendant

1:22-cv-10792-RGS

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE OPPOSITIONS TO SUMMARY JUDGMENT MOTIONS**

NOW come all parties, Plaintiff Kira Wahlstrom (“Plaintiff”), Defendants, David J. Hoey and the Law Offices of David J. Hoey, P.C. (“Hoey Defendants”), Defendants Don C. Keenan, D.C. Keenan & Associates, P.C. d/b/a The Keenan Law Firm, P.C. (“Keenan Defendants”) and the Keenan’s Kids Foundation, Inc. (“KKF”) (collectively, the “Parties”), and respectfully move this Honorable Court to extend the time, up to and including September 22, 2023, for all parties to file their respective opposition papers to the respective summary judgment motions that were timely filed on August 14, 2023 (Dkt. 84, 88, 92). The parties seek less than 20 additional days from the current September 5, 2023 deadline in which to file opposition submissions, up to and including Friday, September 22, 2023. The Parties state that additional time is warranted for them to oppose the respective motions in light of counsel’s respective personal and professional schedules, staffing changes. Further, Plaintiff must oppose two motions. All have agreed and stipulated to the additional time requested.

As grounds for the motion, the Parties state as follows:

1. The Parties have exchanged voluminous materials in discovery and filed their respective summary judgment motions on August 14, 2023. Plaintiff has affirmatively moved for summary judgment, while the Hoey Defendants and the Keenan Defendants have likewise moved for summary judgment.
2. Due to the professional and personal schedules and circumstances of respective counsel, the Labor Day weekend, counsel have conferred and reached agreement to propose new dates in which to file oppositions.
3. Thus, counsel for Plaintiff has an arbitration scheduled the Tuesday September 5, immediately after the Labor Day weekend, which is the current deadline for oppositions to be filed. The California arbitration requires preparation and is scheduled from September 5 through September 8. Plaintiff has two motions to oppose.
4. The last day of employment with Wilson Elser for the prior associate working on this matter with undersigned counsel for the Hoey Defendants was this week. The new associate working on this matter (Attorney Maher) has a previously scheduled vacation planned, leaving August 18, 2023 and returning to the office on August 22, 2023. Undersigned counsel (Attorney Knipper) for the Hoey Defendants is scheduled to be out of the office August 16-18 (traveling for college move-in), and is anticipated to be out of the office Labor Day weekend (including the Friday before and Tuesday September 5). Counsel further has other professional obligations during this time frame.
5. Counsel for the Keenan Defendants has long-scheduled travel planned for the last week of August through Labor Day weekend.

6. L.R. 16.1(g) allows for modification of the Scheduling Order by order of the judicial officer, and only upon a showing of good cause. In light of the above, the Parties respectfully submit that the current matter requires such accommodation, that additional time is needed and that good cause exists to extend the tracking deadlines.

WHEREFORE, the Parties, Plaintiff Kira Wahlstrom, Defendants David J. Hoey and the Law Offices of David J. Hoey, P.C., Don C. Keenan, D.C. Keenan & Associates, P.C. d/b/a The Keenan Law Firm, P.C., and the Keenan's Kids Foundation, Inc., jointly request that this Motion be endorsed / allowed and the time frame for the Parties to file their respective opposition submissions to summary judgment motions be extended up to and including September 22, 2023.

Dated: August 15, 2023

Respectfully submitted,

Plaintiff,
KIRA WAHLSTROM,
By her Attorneys,

/s/ Bridget A. Zerner
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Defendants,
DAVID J. HOEY, and
LAW OFFICES OF DAVID J. HOEY, P.C.,
By their Attorneys,

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Defendants,
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AND D.C. KEENAN & ASSOCIATES, P.C.
D/B/A THE KEENAN LAW FIRM, P.C.

/s/ John J. O'Connor

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Defendants,
KEENAN'S KIDS FOUNDATION, INC.

/s/ William M. Taylor

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CERTIFICATE OF SERVICE

I, Christine A. Knipper, hereby certify that on August 15, 2023, a true copy of the foregoing document was filed through the ECF system, the document will be sent electronically to the registered participants, and copies will be served via electronic mail on those indicated as non-registered participants.

/s/ Christine Knipper

Christine A. Knipper